

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

The Diocese of Buffalo, N.Y.,

Debtor.

Case No. 20-10322

Chapter 11

NOTICE OF FILING

PLEASE TAKE NOTICE that, in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [Docket No. 362], Blank Rome, LLP has filed the *Monthly Fee Statement of Blank Rome, LLP for Compensation for Services Rendered and Reimbursement of Expenses as Special Insurance Counsel to The Diocese of Buffalo, N.Y. for the Period October 1, 2023 Through October 31, 2023*, a copy of which is attached hereto and hereby served upon you.

Dated: November 17, 2023

BLANK ROME, LLP

By: /s/ James R. Murray

James R. Murray

1825 Eye Street NW

Washington, DC 20006

Telephone: (202) 420-3409

Email: jmurray@blankrome.com

*Special Insurance Counsel for
The Diocese of Buffalo, N.Y.*

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

The Diocese of Buffalo, N.Y.,

Debtor.

Case No. 20-10322

Chapter 11

**MONTHLY FEE STATEMENT OF BLANK ROME, LLP FOR COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
AS SPECIAL INSURANCE COUNSEL TO THE DIOCESE OF BUFFALO, N.Y.
FOR THE PERIOD OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

Name of Applicant: Blank Rome, LLP

Authorized to Provide
Professional Services to: The Diocese of Buffalo, N.Y., Debtor-In-Possession

Date of Retention: Order entered June 30, 2020 [Docket No. 423]
Nunc Pro Tunc to February 28, 2020

Period for which compensation
and reimbursement is sought: October 1, 2023 through October 31, 2023

Amount of compensation sought
as actual, reasonable and necessary: 80% of \$125,350.99 (\$100,280.79)

Amount of expense reimbursement sought
as actual, reasonable and necessary: \$2,656.26

This is a: X monthly ____ quarterly ____ final application.

This is Blank Rome's forty-third monthly fee statement in this case.

BLANKROME

1825 EYE STREET NW
WASHINGTON, DC 20006-5403
(202) 420-2200
FEDERAL TAX ID NO. [REDACTED]

DIOCESE OF BUFFALO
C/O JOHN M. SCHOLL
795 MAIN STREET
BUFFALO, NY 14203

INVOICE DATE: NOVEMBER 13, 2023
CLIENT ID: 155760
MATTER NUMBER: 155760-00601 03348
INVOICE NUMBER: 2156018

**REGARDING: DIOCESE OF BUFFALO
INSURANCE ADVICE**

DATE	INVOICE	AMOUNT	CREDITS	BALANCE
07/31/2020	1908397	\$25,484.65	(\$22,561.19)	\$2,548.46
07/31/2020	1908398	\$22,046.42	(\$19,466.78)	\$2,204.64
07/31/2020	1908399	\$55,775.57	(\$49,823.02)	\$5,577.55
07/31/2020	1908400	\$22,514.46	(\$19,888.02)	\$2,251.44
08/20/2020	1911983	\$50,783.53	(\$45,330.16)	\$5,078.37
09/22/2020	1919242	\$59,913.79	(\$53,547.41)	\$5,991.38
10/21/2020	1925894	\$44,914.95	(\$39,840.12)	\$4,491.50
11/16/2020	1931564	\$103,849.68	(\$92,881.37)	\$10,384.97
12/08/2020	1936638	\$67,978.34	(\$60,597.17)	\$6,797.83
01/28/2021	1944850	\$58,271.07	(\$51,914.37)	\$5,773.37
02/23/2021	1950370	\$43,496.36	(\$38,563.39)	\$4,349.64
03/31/2021	1957000	\$37,448.27	(\$33,120.11)	\$3,744.83
04/28/2021	1964026	\$34,425.70	(\$30,983.13)	\$3,442.57
05/26/2021	1970085	\$11,332.51	(\$10,199.26)	\$1,133.25
06/23/2021	1975333	\$5,872.42	(\$5,285.18)	\$587.24
07/26/2021	1981564	\$10,499.90	(\$9,449.91)	\$1,049.99
08/24/2021	1988112	\$24,862.74	(\$22,376.46)	\$2,486.28
09/27/2021	1993685	\$30,361.29	(\$27,325.16)	\$3,036.13
03/16/2023	2103573	\$60,816.29	(\$49,054.16)	\$11,762.13
04/18/2023	2109949	\$79,878.23	(\$64,249.44)	\$15,628.79
05/16/2023	2115985	\$30,207.30	(\$24,165.84)	\$6,041.46
06/14/2023	2121302	\$48,343.77	(\$38,969.28)	\$9,374.49
07/21/2023	2130520	\$22,342.32	(\$18,203.98)	\$4,138.34
08/21/2023	2136611	\$3,787.42	(\$3,168.26)	\$619.16
09/25/2023	2143820	\$10,749.25	\$0.00	\$10,749.25

ACH/WIRE

Mail

Bank Name: Citizens Bank
Address: Philadelphia, PA
Account Title: Blank Rome LLP
Account Number: [REDACTED]
ABA Number: [REDACTED] (Domestic)
Swift Code: [REDACTED] (International)

Blank Rome LLP
Attn: Finance Department
One Logan Square
130 North 18th St
Philadelphia, PA 19103-6998

To pay by Electronic Funds Transfer, visit www.BlankRome.com/Payments

BLANKROME

1825 EYE STREET NW
WASHINGTON, DC 20006-5403
(202) 420-2200
FEDERAL TAX ID NO. [REDACTED]

DIOCESE OF BUFFALO
C/O JOHN M. SCHOLL
795 MAIN STREET
BUFFALO, NY 14203

INVOICE DATE: NOVEMBER 13, 2023
CLIENT ID: 155760
MATTER NUMBER: 155760-00601 03348
INVOICE NUMBER: 2156018

DATE	INVOICE	AMOUNT	CREDITS	BALANCE
10/11/2023	2147374	\$57,275.60	\$0.00	\$57,275.60
BALANCE FORWARD				\$186,518.66
FOR LEGAL SERVICES RENDERED THROUGH 10/31/23			\$125,350.99	
FOR DISBURSEMENTS ADVANCED THROUGH 10/31/23			\$2,656.26	
CURRENT INVOICE TOTAL				\$128,007.25
TOTAL AMOUNT DUE, INCLUDING BALANCE FORWARD				\$314,525.91

REMITTANCE

ACH/WIRE		Mail
Bank Name	Citizens Bank	Blank Rome LLP
Address:	Philadelphia, PA	Attn: Finance Department
Account Title:	Blank Rome LLP	One Logan Square
Account Number:	[REDACTED]	130 North 18 th St
ABA Number:	[REDACTED] (Domestic)	Philadelphia, PA 19103-6998
Swift Code	[REDACTED] (International)	

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INVOICE DATE: NOVEMBER 13, 2023
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MATTER NUMBER: 155760-00601
INVOICE NUMBER: 2156018
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**REGARDING: DIOCESE OF BUFFALO
INSURANCE ADVICE**

FOR LEGAL SERVICES RENDERED THROUGH OCTOBER 31, 2023

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/02/23	PREPARE EMAIL FOR J. MURRAY TO SEND TO INSURERS REGARDING MEDIATION	J. CARTER	0.50	311.85
10/02/23	ANALYZE STATUS OF PARISH INSURER AND PREPARE EMAIL TO PARISH INSURER RELATING TO THE MEDIATION	J. CARTER	1.60	997.92
10/02/23	REVIEW LIST OF DUPLICATE POCS AND NOTES RELATING TO EACH AND EMAIL H. AHN REGARDING CHANGES TO SAME	J. CARTER	0.20	124.74
10/02/23	REVIEW EMAIL LIST FOR COUNSEL TO CONFIRM THAT EACH RECEIVED EMAIL RELATING TO MEDIATION	J. CARTER	2.10	1,309.77
10/02/23	E-MAILS WITH CARRIER COUNSEL REGARDING MEDIATION AND RESPOND TO INQUIRIES REGARDING SAME	J. MURRAY	0.70	590.21
10/02/23	TELECONFERENCE WITH MEDIATOR (JUDGE NEMOYER) REGARDING MEDIATION	J. MURRAY	0.10	84.32
10/02/23	TELECONFERENCE WITH F. ELSAESSER REGARDING MEDIATION STRATEGY	J. MURRAY	0.40	337.26
10/02/23	REVIEW COMMITTEE ANALYSIS ON ASSIGNMENTS AND RELATED ISSUES	J. MURRAY	0.80	674.52
10/03/23	EMAIL TO DEBTOR'S BANKRUPTCY COUNSEL REGARDING LIST OF DUPLICATES	J. CARTER	0.20	124.74
10/05/23	REVIEW EMAIL FROM A. RIVERA REGARDING PREPARING DECLARATION IN SUPPORT OF ENJOINING LITIGATION	J. CARTER	0.40	249.48
10/06/23	TELEPHONE CONFERENCE WITH E. CYGAL (CATHOLIC MUTUAL) REGARDING MEDIATION ISSUES	J. MURRAY	0.30	252.95
10/06/23	REVIEW ASSIGNMENT CASES AS RELATES TO MEDIATION STRATEGY	J. MURRAY	0.80	674.52
10/06/23	CHECK DOCKETS FOR, THEN DOWNLOAD DECLARATIONS OF J. MURRAY FILED IN BANKRUPTCY COURT AS WELL AS ADVERSARIAL PROCEEDINGS	K. ROGERS	0.70	227.50

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/10/23	REVIEW AND REVISE DRAFT DECLARATION AND VARIOUS EMAILS AND TELEPHONE CONFERENCES WITH H. AHN AND DEBTOR BANKRUPTCY COUNSEL REGARDING SAME	J. CARTER	3.90	2,432.43
10/10/23	DISCUSSION WITH CNA REGARDING MEDIATION	J. MURRAY	0.50	421.58
10/10/23	REVIEW AND REVISE MURRAY DECLARATION IN SUPPORT OF MOTION TO STAY	H. AHN	1.20	498.96
10/10/23	REVIEW AND REVISE COVERAGE CHART	H. AHN	0.30	124.74
10/11/23	UPDATE COVERAGE CHART WITH LATEST INSURANCE INFORMATION	K. ROGERS	0.50	162.50
10/11/23	REVISE DECLARATION IN SUPPORT OF MOTION FOR STAY AND ANALYZE POLICIES IN CONNECTION WITH SAME	J. CARTER	3.60	2,245.32
10/11/23	MAKE REVISIONS TO COVERAGE CHART	J. CARTER	0.70	436.59
10/11/23	COMMUNICATE WITH H. AHN AND K. ROGERS REGARDING REVIEW OF POCS AND LIST OF CLAIMANTS WHO FILED POCS AND ALSO A LAWSUIT AGAINST A PARISH, IN CONNECTION WITH MOTION TO CONTINUE STAY OF LITIGATION AGAINST PARISHES	J. CARTER	0.40	249.48
10/11/23	COMMUNICATE WITH DEBTOR'S BANKRUPTCY COUNSEL FOLLOWING UP ON LIST OF CLAIMANTS THAT FILED MULTIPLE POCS	J. CARTER	0.20	124.74
10/11/23	REVISE AND SEND LIST OF CLAIMANTS THAT SUBMITTED MORE THAN ONE POC FORM TO MEDIATOR AND CHUBB COUNSEL	J. CARTER	0.70	436.59
10/11/23	REVIEW CARRIER ALLOCATIONS AND FOLLOW UP WITH SEVERAL CARRIER COUNSEL REGARDING MEDIATION	J. MURRAY	0.80	674.52
10/11/23	CONFER WITH J. CARTER RE ANALYSIS OF CLAIMS INCLUSIVE OF ALLEGATIONS AGAINST PARISH AND PARISH ENTITIES AND RELATED ISSUES	H. AHN	0.50	207.90
10/11/23	CREATE UPDATED CLAIMS MATRIX FOR CARRIERS	H. AHN	0.40	166.32
10/12/23	REVIEW OF POCS TO DETERMINE WHICH FLED SUIT VERSUS A PARISH; UPDATE LIST OF SAME WHILE REVIEWING	K. ROGERS	5.20	1,690.00
10/12/23	EMAIL CORRESPONDENCE WITH J. CARTER RE ACCOUNTING OF PENDING LAWSUITS AGAINST PARISHES THAT POTENTIALLY IMPLICATE POST-1973 DIOCESE INSURANCE PROGRAM;	H. AHN	0.20	83.16
10/12/23	ANALYZE PROOFS OF CLAIM AND LAWSUIT FOR PLAINTIFF AB 637	H. AHN	0.20	83.16

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/12/23	EMAIL CORRESPONDENCE WITH J. CARTER RE PROOFS OF CLAIM FOR PLAINTIFF AB 637 AND RELATED ISSUES	H. AHN	0.10	41.58
10/12/23	REVISE LIST OF PENDING LAWSUITS AGAINST PARISH DEFENDANTS	H. AHN	0.70	291.06
10/12/23	REVIEW DRAFT EXHIBIT FOR MOTION TO STAY LITIGATION AND CONFERENCE WITH H. AHN REGARDING SAME	J. CARTER	0.70	436.59
10/13/23	ANALYZE PROOF OF CLAIM DOCUMENTS FOR PENDING LAWSUITS AGAINST PARISHES	A. BERMAN	3.90	1,486.49
10/13/23	REVIEW DECLARATION AND POCS ANALYSIS FOR CARRIER QUESTIONS	J. MURRAY	0.90	758.84
10/13/23	ANALYSIS OF POCS TO DETERMINE WHICH FILED SUIT VERSUS A PARISH	K. ROGERS	6.50	2,112.50
10/13/23	REVIEW REVISIONS TO LIST OF SUITS FILED BY PLAINTIFFS ALLEGING ABUSE DURING DIOCESE INSURANCE POLICIES FOR MOTION TO STAY AND SEND TO DEBTOR'S BANKRUPTCY COUNSEL	J. CARTER	0.80	498.96
10/13/23	TELEPHONE CONFERENCE WITH J. EATON REGARDING MOTION TO STAY LITIGATION	J. CARTER	0.20	124.74
10/13/23	REVIEW TABLE OF CLAIMANTS WHO INDICATED IN POCS THAT THEY FILED LAWSUITS AGAINST PARISHES IN CONNECTION WITH MOTION TO STAY AND EMAIL DEBTOR'S BANKRUPTCY COUNSEL REGARDING SAME	J. CARTER	0.40	249.48
10/13/23	REVIEW AND ANALYZE PROOFS OF CLAIMS FOR REFERENCE TO LAWSUITS AGAINST PARISH OR PARISH RELATED ENTITIES	H. AHN	0.70	291.06
10/16/23	RESPOND TO EMAIL REQUESTS FROM INSURER REGARDING INFORMATION ABOUT POCS AND MATRIX	J. CARTER	0.20	124.74
10/16/23	REVIEW EMAIL FROM S. DONATO REGARDING STIPULATION REGARDING STAYING LITIGATION AGAINST PARISHES	J. CARTER	0.10	62.37
10/16/23	EMAILS WITH H. AHN REGARDING UPDATING THE MATRIX FOR MEDIATION	J. CARTER	0.10	62.37
10/16/23	EMAILS WITH H. AHN AND K. ROGERS AND TELEPHONE CONFERENCE WITH H. AHN REGARDING EXHIBIT IN SUPPORT OF MOTION TO STAY PARISH LITIGATION	J. CARTER	0.20	124.74
10/16/23	CHECK STATUS OF PRODUCTION OF PARISH POLICY REPORT AND EMAIL DEBTOR'S BANKRUPTCY COUNSEL REGARDING SAME	J. CARTER	1.60	997.92
10/16/23	UPDATE LIST OF PROOFS OF CLAIM THAT ALSO FILED A COMPLAINT WITH THE YEARS THE CLAIMANT WAS ABUSED	K. ROGERS	3.40	1,105.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/16/23	RESPOND TO CARRIERS REGARDING MEDIATION PROPOSAL	J. MURRAY	0.70	590.21
10/16/23	REVIEW STRATEGY AND SCHEDULE FOR STAY MOTION WITH S. DONATO	J. MURRAY	0.40	337.26
10/16/23	EMAIL CORRESPONDENCE WITH J. CARTER RE: COMPILATION OF INFORMATION FOR MOTION TO STAY PARISH ACTIONS	H. AHN	0.30	124.74
10/16/23	REVIEW AND REVISE COMPILATION OF PROOF OF CLAIMS WITH CORRESPONDING LAWSUITS AGAINST PARISHES AND RELATED ENTITIES	H. AHN	0.90	374.22
10/17/23	UPDATE CONTACT LISTS WITH THE LATEST CONTACT INFORMATION FOR COUNSEL IN THIS MATTER	K. ROGERS	0.20	65.00
10/17/23	PREPARE EMAIL WITH IAG REPORT IN RESPONSE TO EMAILS FROM INSURERS, REVIEW DOCUMENTS AND PRIOR COMMUNICATIONS RELATING TO SAME, AND VARIOUS EMAILS WITH J. MURRAY REGARDING SAME	J. CARTER	3.80	2,370.06
10/17/23	DRAFT INSURER CORRESPONDENCE, INCLUDING REVIEWING/ANALYZING POCS, FINANCIAL REPORTS IN CONNECTION WITH THE SAME	R. MICHAELSON	3.90	1,876.88
10/17/23	REVIEW NUMEROUS INQUIRIES FROM CARRIERS REGARDING POLICY PROOF AND RESPOND TO SAME	J. MURRAY	0.90	758.84
10/17/23	REVIEW ARCHEOLOGY PRIOR WORK AND PRIOR DISSEMINATION OF SAME AND PREPARE COMMUNICATION TO CARRIERS AND COMMITTEE	J. MURRAY	1.80	1,517.67
10/17/23	REVIEW PARISH CARRIER PROPOSED ALLOCATIONS FOR MEDIATION	J. MURRAY	1.50	1,264.73
10/18/23	TELEPHONE CALL WITH HSB COUNSEL REGARDING MEDIATION AND FOLLOW UP EMAIL TO SAME	J. CARTER	0.80	498.96
10/18/23	UPDATE FEE APPLICATION	J. CARTER	1.10	686.07
10/18/23	DRAFT INSURER CORRESPONDENCE, INCLUDING FINANCIAL REPORTS IN CONNECTION WITH THE SAME	R. MICHAELSON	3.30	1,588.13
10/18/23	REVIEW AND EDIT DRAFTS OF DECLARATION AND INSURANCE SECTION OF MOTION	J. MURRAY	1.30	1,096.10
10/18/23	REVIEW OF HARTFORD STEAM BOILER POLICY ARGUMENT	J. MURRAY	0.40	337.26
10/18/23	REVIEW FIRST STATE'S REQUESTS FOR MEDIATION ATTENDANCE	J. MURRAY	0.30	252.95
10/18/23	EMAIL AND FOLLOW UP WITH S. MYERS	J. MURRAY	0.50	421.58

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
	(TRAVELERS) FOR MEDIATION			
10/18/23	COORDINATE AND VERIFY COMPILATION OF PROOF OF CLAIMS WITH CORRESPONDING LAWSUITS AGAINST PARISH AND RELATED ENTITIES	H. AHN	2.20	914.76
10/18/23	EMAIL CORRESPONDENCE WITH J. CARTER RE COMPILATION OF LAWSUITS FOR MOTION TO STAY PARISH ACTIONS	H. AHN	0.20	83.16
10/19/23	RESPOND TO QUESTIONS FROM A. RIVERA REGARDING DRAFT OF DECLARATION IN SUPPORT OF MOTION FOR STAY	J. CARTER	1.10	686.07
10/19/23	REVIEW AND EDITS TO DRAFTS OF STAY MOTION AS RELATES TO INSURANCE, INCLUDING AFFIDAVIT	J. MURRAY	2.60	2,192.19
10/19/23	REVIEW SEVERAL POLICY LANGUAGE STATEMENTS AND FOLLOW UP WITH BOND TEAM	J. MURRAY	0.80	674.52
10/19/23	REVIEW COMMUNICATIONS WITH CARRIERS FOR MEDIATION	J. MURRAY	1.00	843.15
10/19/23	REVIEW/ANALYZE/DRAFT RESPONSES TO INSURER CORRESPONDENCE, INCLUDING REVIEWING POLICY DOCUMENTATION, POCS IN CONNECTION WITH THE SAME	R. MICHAELSON	0.80	385.00
10/19/23	REVIEW DRAFT LETTER TO FIRST STATE AND PROVIDE COMMENTS TO R. MICHAELSON	J. CARTER	0.70	436.59
10/19/23	REVISE/UPDATE FEE APPLICATION	J. CARTER	0.80	498.96
10/19/23	CONFER WITH J. CARTER RE: EXHIBITS TO MURRAY DECLARATION AND RELATED ISSUES	H. AHN	0.20	83.16
10/20/23	UPDATE EXHIBIT OF PROOF OF CLAIMS BY INCORPORATING THE INSURANCE INFORMATION FOR EACH CLAIM	K. ROGERS	3.30	1,072.50
10/20/23	CALL WITH H. AHN RE DRAFT FILING	R. MICHAELSON	0.30	144.38
10/20/23	REVIEW/ANALYZE/DRAFT RESPONSES TO INSURER CORRESPONDENCE, INCLUDING REVIEWING POLICY DOCUMENTATION, POCS IN CONNECTION WITH THE SAME	R. MICHAELSON	1.50	721.88
10/20/23	WORK ON INSURER ANALYSIS FOR MEDIATION	J. MURRAY	1.50	1,264.73
10/20/23	REVISE AND COMMENT ON DRAFT LETTER TO FIRST STATE REGARDING QUESTIONS ABOUT DATES OF ALLEGED ABUSE IN CERTAIN POCS AND PROVIDE COMMENTS TO R. MICHAELSON	J. CARTER	0.90	561.33
10/20/23	TELEPHONE CONFERENCE WITH H. AHN REGARDING QUESTIONS RELATING TO PREPARING EXHIBITS FOR MOTION FOR	J. CARTER	0.10	62.37

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
	STAY			
10/20/23	REVIEW DRAFTS OF EXHIBITS FOR MOTION FOR STAY AND EMAIL COMMENTS TO H. AHN	J. CARTER	0.40	249.48
10/20/23	REVISE LIST OF PROOFS OF CLAIMS WITH CORRESPONDING LAWSUITS AGAINST PARISHES ALLEGING ABUSE AFTER 1973; ANALYZE NUMBER OF PROOFS OF CLAIMS TRIGGERING CARRIERS OF POST-1973 INSURANCE PROGRAMS	H. AHN	5.00	2,079.00
10/21/23	REVISE LIST OF PROOFS OF CLAIMS WITH CORRESPONDING LAWSUITS AGAINST PARISHES ALLEGING ABUSE BEFORE 1973	H. AHN	2.10	873.18
10/21/23	REVISE DECLARATION IN SUPPORT OF MOTION FOR ORDER STAYING LITIGATION AGAINST PARISHES	J. CARTER	1.90	1,185.03
10/22/23	REVISE DECLARATION IN SUPPORT OF MOTION TO STAY INCLUDING REVIEW AND REVISE EXHIBITS THERETO	J. CARTER	2.60	1,621.62
10/23/23	REVISE J. MURRAY DECLARATION IN SUPPORT OF MOTION FOR STAY AND COORDINATE WITH H. AHN AND R. MICHAELSON REGARDING EXHIBITS	J. CARTER	4.50	2,806.65
10/23/23	REVIEW LETTER FROM CHUBB REGARDING CLAIMS AND VARIOUS EMAILS WITH J. MURRAY AND R. MICHAELSON REGARDING SAME	J. CARTER	0.30	187.11
10/23/23	CALL WITH H. AHN RE DRAFT FILING	R. MICHAELSON	0.20	96.25
10/23/23	DRAFT RESPONSES TO INSURER CORRESPONDENCE, INCLUDING REVIEWING POLICY DOCUMENTATION, POCS IN CONNECTION WITH THE SAME	R. MICHAELSON	3.80	1,828.75
10/23/23	FOLLOW-UP CALL WITH H. AHN RE DRAFT FILING	R. MICHAELSON	0.10	48.13
10/23/23	REVIEW/ANALYZE MATRIX, PLEADINGS IN CONNECTION WITH DRAFT FILING	R. MICHAELSON	1.30	625.63
10/23/23	EMAIL CORRESPONDENCE AND CONFER WITH J. CARTER RE EXHIBITS TO MURRAY DECLARATION AND RELATED ISSUES	H. AHN	0.40	166.32
10/23/23	REVIEW AND COMMENT ON MURRAY DECLARATION	H. AHN	0.30	124.74
10/23/23	FINALIZE EXHIBITS TO MURRAY DECLARATION	H. AHN	0.60	249.48
10/23/23	ANALYZE AND COMPILE STAND-ALONE LAWSUITS AGAINST DIOCESE AND PARISHES	H. AHN	2.10	873.18
10/23/23	DRAFT EXHIBITS REFLECTING STAND ALONE LAWSUITS AGAINST THE DIOCESE AND PARISHES	H. AHN	0.60	249.48

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/24/23	PREPARE SETTLEMENT ANALYSIS FOR EACH CARRIER/MEDIATION	J. MURRAY	3.00	2,529.45
10/24/23	REVISE LETTER TO INSURER REGARDING CLAIMS	J. CARTER	1.30	810.81
10/24/23	COMMUNICATION WITH J. MURRAY, R. MICHAELSON, AND H. AHN IN PREPARATION FOR MEDIATION	J. CARTER	0.20	124.74
10/24/23	REVIEW AND PROVIDE COMMENTS ON EMAIL TO INSURER REQUESTING POLICY INFORMATION	J. CARTER	0.10	62.37
10/24/23	PREPARE VARIOUS EMAILS WITH INSURERS AND MEDIATOR REGARDING UPDATED MATRIX AND CLAIMS	J. CARTER	0.90	561.33
10/24/23	CALL WITH H. AHN RE CLAIMS MATRIX	R. MICHAELSON	0.30	144.38
10/24/23	FOLLOW-UP CALL WITH H. AHN RE CLAIMS MATRIX	R. MICHAELSON	0.20	96.25
10/24/23	ASSIST WITH MEDIATION PREPARATION, INCLUDING REVIEWING/RESPONDING TO INSURER CORRESPONDENCE, REVIEWING/REVISING CLAIMS MATRIX	R. MICHAELSON	6.30	3,031.88
10/24/23	EMAIL CORRESPONDENCE WITH R. MICHAELSON RE FINALIZING CLAIMS LIST FOR CARRIERS	H. AHN	0.20	83.16
10/24/23	EMAIL CORRESPONDENCE WITH J. CARTER RE CLAIMS LISTING FOR CARRIERS	H. AHN	0.10	41.58
10/24/23	REVIEW, ANALYZE, CATEGORIZE CLAIMS IMPACTING POST 1973 CARRIERS	H. AHN	1.20	498.96
10/25/23	REVIEW AND REVISE ALLOCATION ANALYSIS FOR ALL CARRIERS TO PREPARE FOR MEDIATION; REVIEW PARISH PROOF QUESTIONS	J. MURRAY	4.10	3,456.92
10/25/23	CALL WITH H. AHN RE UPDATES TO CLAIMS MATRIX	R. MICHAELSON	0.50	240.63
10/25/23	ASSIST WITH MEDIATION PREPARATION, INCLUDING REVIEWING/RESPONDING TO INSURER CORRESPONDENCE, REVIEWING/REVISING CLAIMS MATRIX, REVIEWING/ANALYZING FINANCIAL REPORTS, POCS, PLEADINGS IN CONNECTION WITH THE SAME	R. MICHAELSON	10.50	5,053.13
10/25/23	TELEPHONE CONFERENCE WITH DEBTOR'S BANKRUPTCY COUNSEL AND PARISH COUNSEL REGARDING MEDIATION STRATEGY	J. CARTER	0.20	124.74
10/25/23	VARIOUS EMAILS WITH INSURERS REGARDING MEDIATION	J. CARTER	2.50	1,559.25
10/25/23	PREPARE FOR MEDIATION	J. CARTER	2.80	1,746.36

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/25/23	REVIEW AND REVISE CLAIMS MATRIX TO REFLECT DE-DUPLICATION OF CLAIMS	H. AHN	4.90	2,037.42
10/25/23	STRATEGIZE WITH R. MICHAELSON RE REVISION OF CLAIMS MATRIX TO REFLECT DE-DUPLICATION OF CLAIMS	H. AHN	0.30	124.74
10/26/23	PULL FINANCIAL REPORTS FOR CERTAIN CLAIMS	K. ROGERS	0.30	97.50
10/26/23	ATTEND MEDIATION (INSURANCE COMPANIES) IN BUFFALO	J. MURRAY	8.50	7,166.78
10/26/23	REVIEW AND PREPARE ANALYSIS FOR CARRIER PRESENTATION	J. MURRAY	1.20	1,011.78
10/26/23	ASSIST WITH MEDIATION, INCLUDING REVIEWING/RESPONDING TO INSURER CORRESPONDENCE, REVIEWING/REVISING CLAIMS MATRIX, REVIEWING/ANALYZING FINANCIAL REPORTS, POCS, PLEADINGS IN CONNECTION WITH THE SAME	R. MICHAELSON	4.30	2,069.38
10/26/23	CALL WITH J. CARTER RE INSURER REQUESTS, SETTLEMENT NEGOTIATIONS	R. MICHAELSON	0.20	96.25
10/26/23	FOLLOW UP CALL WITH J. CARTER RE INSURER REQUESTS, SETTLEMENT NEGOTIATIONS	R. MICHAELSON	0.20	96.25
10/26/23	ATTEND AND PARTICIPATE IN MEDIATION IN BUFFALO AND PREPARE FOR SAME	J. CARTER	9.40	5,862.78
10/26/23	REVIEW AND REVISE CLAIMS MATRIX TO REFLECT ACCOUNTING OF DUPLICATIVE CLAIMS	H. AHN	1.70	706.86
10/27/23	ATTEND MEDIATION ON BUFFALO	J. MURRAY	8.00	6,745.20
10/27/23	REVIEW CARRIER ALLOCATIONS	J. MURRAY	1.00	843.15
10/27/23	ATTEND AND PARTICIPATE IN MEDIATION	J. CARTER	7.20	4,490.64
10/27/23	ASSIST WITH MEDIATION, INCLUDING REVIEWING/RESPONDING TO INSURER CORRESPONDENCE, REVIEWING/REVISING CLAIMS MATRIX, REVIEWING/ANALYZING FINANCIAL REPORTS, POCS, PLEADINGS IN CONNECTION WITH THE SAME	R. MICHAELSON	0.80	385.00
10/27/23	ASSIST WITH MEDIATION, INCLUDING REVIEWING/RESPONDING TO INSURER CORRESPONDENCE, REVIEWING/REVISING CLAIMS MATRIX, REVIEWING/ANALYZING FINANCIAL REPORTS, POCS, PLEADINGS IN CONNECTION WITH THE SAME	R. MICHAELSON	0.90	433.13
10/30/23	CONFER WITH J. CARTER AND R. MICHAELSON RE DEBRIEF OF MEDIATION, DISCOVERY IN CONNECTION WITH MOTION TO STAY PARISH LITIGATION, AND RELATED ISSUES	H. AHN	0.50	207.90
10/30/23	REVIEW/ANALYZE/FOLLOW UP RE	R. MICHAELSON	0.50	240.63

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
	DISCOVERY DEMANDS			
10/30/23	REVIEW/ANALYZE FILINGS	R. MICHAELSON	0.40	192.50
10/30/23	CALL WITH BOND SCHOENECK & KING, J. CARTER RE DISCOVERY	R. MICHAELSON	0.70	336.88
10/30/23	FOLLOW UP CALL WITH J. CARTER, H. AHN RE MEDIATION, NEXT STEPS	R. MICHAELSON	0.10	48.13
10/30/23	FOLLOW UP CALL WITH H. AHN RE DISCOVERY, MEDIATION, NEXT STEPS	R. MICHAELSON	0.10	48.13
10/30/23	CALL WITH J. CARTER, H. AHN RE DISCOVERY, MEDIATION, NEXT STEPS	R. MICHAELSON	0.30	144.38
10/30/23	REVIEW/REVISE MATRIX IN CONNECTION WITH MEDIATION FOLLOW-UP, INSURER CORRESPONDENCE, INCLUDING REVIEWING PLEADINGS IN CONNECTION WITH THE SAME	R. MICHAELSON	3.30	1,588.13
10/30/23	REVIEW AND COMMENT TO TEAM ON DISCOVERY REQUESTS FROM COMMITTEE	J. MURRAY	0.90	758.84
10/30/23	REVIEW CARRIER ALLOCATION ANALYSIS FOR MEDIATION	J. MURRAY	0.80	674.52
10/30/23	REVIEW AND ANALYZE COMMITTEE DISCOVERY REQUESTS IN CONNECTION WITH MOTION FOR STAY OF LITIGATION AGAINST PARISHES	J. CARTER	1.30	810.81
10/30/23	TELEPHONE CONFERENCE WITH DEBTOR BANKRUPTCY COUNSEL REGARDING RESPONDING TO COMMITTEE REQUESTS	J. CARTER	0.60	374.22
10/30/23	CONFER WITH R. MICHAELSON AND H. AHN REGARDING RESPONDING TO COMMITTEE DISCOVERY REQUESTS AND QUESTIONS/ISSUES RAISED BY INSURERS IN MEDIATION	J. CARTER	0.60	374.22
10/31/23	REVIEW CARRIER REQUESTS AND FOLLOW UP REGARDING SETTLEMENT PROPOSAL	J. MURRAY	0.80	674.52
10/31/23	REVIEW/REVISE MATRIX IN CONNECTION WITH MEDIATION FOLLOW-UP, INSURER CORRESPONDENCE, INCLUDING REVIEWING PROOFS OF CLAIMS, PLEADINGS, COVERAGE CHART, CLAIM ANALYSES IN CONNECTION WITH THE SAME	R. MICHAELSON	7.10	3,416.88
10/31/23	EMAILS WITH J. MURRAY AND R. MICHAELSON REGARDING INSURANCE CLAIM MATRIX AND MEDIATION	J. CARTER	0.50	311.85
TOTAL SERVICES				\$125,350.99

FOR DISBURSEMENTS ADVANCED THROUGH OCTOBER 31, 2023

DATE	DESCRIPTION	AMOUNT
10/25/23	AIRFARE: JAMES CARTER TRAVEL FOR MEDIATION ON 10/25/23	528.31

DATE	DESCRIPTION	AMOUNT
10/25/23	OUT OF TOWN LODGING: JAMES CARTER TRAVEL FOR MEDIATION ON 10/25/23	878.88
10/25/23	AIRFARE: JAMES MURRAY ATTEND MEDIATION. ON 10/26/23	429.97
10/26/23	OUT OF TOWN LODGING: JAMES MURRAY ATTEND MEDIATION. ON 10/26/23	819.10
TOTAL DISBURSEMENTS		\$2,656.26

CURRENT INVOICE TOTAL	\$128,007.25
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TIME AND FEE SUMMARY

TIMEKEEPER	RATE	HOURS	FEES
JAMES CARTER	623.70	65.40	40,789.98
JAMES MURRAY	843.15	47.30	39,881.07
ALEXANDER H. BERMAN	381.15	3.90	1,486.49
HANNAH K. AHN	415.80	28.10	11,683.98
ROBYN MICHAELSON	481.25	51.90	24,976.97
KEVIN ROGERS	325.00	20.10	6,532.50
TOTALS		216.70	\$125,350.99